## Case 1:23-cv-04622-JPC Document 23 Filed 06/26/23 Page 1 of 1



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June 26, 2023

## Via ECF

Honorable John P. Cronan United States Court Southern District of New York 500 Pearl St. New York, NY 10007-1312

Re: St. Charles New York Inc. v. E. Lawrence Design, LLC; New Day

Woodwork, Inc.; RBL Metals, LLC; Amy Schorr; and Brian Schorr

Civil Action No. 1:23-cv-4622

## Dear Judge Cronan:

I represent Defendants Amy Schorr and Brian Schorr (the "Schorrs") in the above-captioned matter. I write pursuant to Local Civil Rule 7.1 and Sections 1.A and 3.B of your Honor's Individual Rules and Practices in Civil Cases, Rev. Jan. 9, 2023. The Schorrs request that they be granted a thirty (30) day extension of time to Friday, July 28, 2023 to file their response to St. Charles New York, Inc.'s ("St. Charles") Complaint (Dkt. No. 1). Without admitting that service was appropriate, proper, or effective, and without waiving the right to object to service, and in support and in compliance with Section 3.B of your Honor's Individual Rules, the Schorrs state as follows:

- 1. Pursuant to Dkt. Nos. 19 and 20, the Answer is presently due on **June 28, 2023**. The requested extension is thirty (30) days to **July 28, 2023**.
- 2. This request is made in order to permit the Schorrs to investigate the allegations contained in St. Charles' Complaint after retaining the undersigned counsel.
- 3. This is the Schorrs' first request for an extension of time in this matter.
- 4. There have been no previous requests.
- 5. Plaintiff St. Charles consents to this extension.

The Schorrs respectfully request that this Court grant the unopposed request extend the Schorrs' time to Answer the Complaint to July 28, 2023.

Best,

Jennifer M. Przybylski

Counsel for Defendants Amy & Brian Schorr

cc: Counsel of Record via ECF